1 Daniel P. Iannitelli - 203388 FOTOUHI • EPPS • HILLGER • GILROY LLP 2 160 Pine Street, Suite 710 San Francisco, CA 94111 3 Tel: 415.362.9300 415.358.5521 Fax: 4 Email: sfotouhi@fe-law.com Email: diannitelli@fe-law.com 5 Attorneys for Plaintiff RANDALL SLOAN 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHER DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 11 RANDALL J. SLOAN, No. CV 08-1849 SBA 12 Plaintiff, **DECLARATION OF DANIEL P.** vs. IANNITELLI IN SUPPORT OF P 13 OPPOSITION TO PFIZER'S MOTION PFIZER, INC., a Delaware corporation; and TO TRANSFER VENUE 14 DOES 1 through 40, inclusive, Date: July 29, 2008 Time: 1:00 p.m. 15 Defendants. Place: Courtroom 3 16 Court: Hon. Saundra B. Armstrong 17 I, Daniel P. Iannitelli, declare: 18 19 1. I am an attorney duly licensed to practice law in the State of California and am a 20 partner in the law firm FOTOUHI • EPPS • HILLGER • GILROY LLP, attorneys of record 21 herein for Plaintiff Randall Sloan in the above-captioned case. 22 2. I have personal knowledge of the matters set forth herein, and if called upon as a 23 witness could competently testify thereto. 24 3. Mr. Randall Sloan is presently without an income and his been unemployed 25 since January 8, 2007. He is living on limited means and is seeking social security benefits. He 26 is nearly destitute relying on the financial assistance of others, including Government agencies

whom I recently consulted with, are in poor states.

and community resources. Mr. Sloan's mental and physical health, according to his physicians

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1	4.	The fo	ollowing witnesses have information relating to the claims asserted by Mr
2	Randall Sloan in this lawsuit and are expected to testify to such:		
3		(a)	Randall Sloan, 563 Webster, Apt. F, San Francisco, California.
4		(b)	Denise Bouvier, St. Mary's Medical Center, 450 Stanyan St., San
5			Francisco, California.
6		(c)	Robert E. O'Brien, MD, 2250 Hayes Street, San Francisco, California.
7		(d)	Dr. Lory D. Wiviott, 2100 Webster St., Suite 404, San Francisco,
8			California.
9		(e)	Bridgett Stringer, PA-C, St. 2235 Hayes Street, 5 th Floor, San Francisco
10			California.
11		(f)	Dr. Rick Loftus, 45 Castro Street, Suite 415, San Francisco, California.
12		(g)	California Pacific Medical Center, San Francisco, California.
13	5. I have conducted research and have identified several operations centers and/o		
14	business offices of Pfizer, Inc., within the State of California, including locations in South San		
15	Francisco, Sacramento, La Jolla and Irvine.		
16	I declare under penalty of perjury under the laws of the United States of America and		
17	the State of California that the foregoing is true and correct.		
18	Executed this 9 th day of July, 2007, at San Francisco, California.		
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20	/s/ Daniel P. Iannitelli Daniel P. Iannitelli		
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